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3 Social Security Administration
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8 Attorneys for Defendant

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**
12 **LAS VEGAS DIVISION**

13 DYANNE L. SCHWALM,)	Case No: 2:18-cv-01587-APG-PAL
)	
14 Plaintiff)	
)	
15 v.)	STIPULATION FOR EXTENSION OF
)	TIME TO FILE DEFENDANT'S CROSS
16)	MOTION TO AFFIRM
17 NANCY A. BERRYHILL, Acting)	
Commissioner of Social Security,)	(Second Request)
)	
18 Defendant.)	
)	

19
20 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, hereby requests
21 an extension of time of fourteen days to Friday, May 31, 2019, to prepare and file her cross
22 motion to affirm. This is the Commissioner's first request for an extension.

23 Upon review of the record and Plaintiff's MSJ, the undersigned believes that this case
24 may warrant voluntary remand in lieu of further litigation. Defendant therefore respectfully
25 requests this additional time to attempt to obtain remand authority.

1 On May 17, 2019, Plaintiff's counsel informed Defendant by email that he had no
2 objection to this extension.

3
4 Respectfully submitted,

5 Date: May 17, 2019

LAW OFFICES OF LAWRENCE D. ROHLFING

6 By: /s/*Cyrus Safa

7 CYRUS SAFA

8 *authorized by email May 17, 2019

9 Attorney for Plaintiff

10 Date: May 17, 2019

NICHOLAS A. TRUTANICH

11 United States Attorney

12 By: /s/Michael K. Marriott

13 MICHAEL K. MARRIOTT

14 Assistant Regional Counsel

15 Attorneys for Defendant

16 Of Counsel

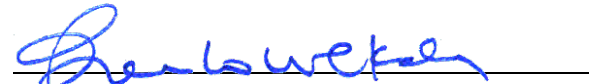
Jeffrey Chen

17 Assistant Regional Counsel

18 Social Security Administration

19
20 IT IS SO ORDERED.

21
22 DATE: May 21, 2019



23 HONORABLE BRENDA WEKSLER

24 United States Magistrate Judge

CERTIFICATE OF SERVICE

I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:

Cyrus Safa
Law Offices of Lawrence D. Rohlfing
12631 E. Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670

Date: May 17, 2019

NICHOLAS A. TRUTANICH
United States Attorney

By: /s/ Michael K. Marriott
MICHAEL K. MARRIOTT
Assistant Regional Counsel

Attorneys for Defendant